

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

JANE DOE,

Case No. 4:21-cv-3049

Plaintiff,

Hon. John M. Gerrard

v.

BOARD OF REGENTS OF THE
UNIVERSITY OF NEBRASKA, et al.;

**DECLARATION OF ELIZABETH
ABDNOUR**

Defendants.

I, Elizabeth Abdnour, make this Declaration in lieu of an affidavit as permitted by 28 U.S.C. § 1746. I am aware that this Declaration will be filed in the United States District Court for the District of Nebraska and that it is the legal equivalent of a statement under oath.


1. I am over the age of 18 and competent in all respects to make this Declaration. The facts contained herein are based upon my personal knowledge.
2. I am an attorney at the law firm Abdnour Weiker, LLP, and counsel for Plaintiff Jane Doe.¹
3. This Declaration is offered in support of Plaintiff's Brief in Opposition to Defendants' Motion for Summary Judgment and in support of her Brief in Opposition to Defendants' Motion to Exclude Plaintiff's Experts and Strike.
4. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Deposition of Lin-Chi Wang.
5. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of Andrew Verzilli.

¹ Jane Doe is a pseudonym.

6. Attached hereto as Exhibit 3 is a true and correct copy of the UNL Response to Allegations of Employee Sexual Misconduct policy, provided by Defendants in discovery and Bates stamped as BRUN 0710-14.
7. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the deposition of Plaintiff Jane Doe.
8. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the deposition of Defendant Tamiko Strickman.
9. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiff's curriculum vitae, used by Defendants at Plaintiff's Deposition and marked as Exhibit 32.
10. Attached hereto as Exhibit 7 is a true and correct copy of an email sent from Plaintiff to John Roe on June 26, 2016, provided by Defendants in discovery and Bates stamped as BRUN 2769.
11. Attached hereto as Exhibit 8 are reports and a safety plan prepared by the University of Nebraska-Lincoln Police Department, provided by Defendants in discovery and Bates stamped as BRUN 3275-85.
12. If called as a witness to testify, I would competently testify to each fact contained in this Declaration.

Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that I have read the foregoing declaration consisting of twelve (12) numbered paragraphs and that it is true and correct to the best of my knowledge, information, and belief.

Executed on this 13th day of November, 2023.


Elizabeth Abdnour